

STATEMENT OF BASIS

Low-Level Radioactive Waste Disposal Facility

Envirocare of Utah, Inc.
605 North 5600 West
Salt Lake City, UT 84116

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Purpose

The purpose of this Statement of Basis is to describe proposed changes to Radioactive Material License No. UT 2300249 (hereafter License) for the Envirocare of Utah, Inc. (hereafter Licensee) low-level radioactive waste disposal facility near Clive, Tooele County, Utah; located in Section 32, Township 1 South, Range 11 West, SLBM.

The proposed changes will be integrated into Amendment #19 of the License, as described below.

Major License Changes

Currently, the maximum isotopic concentrations authorized for disposal under the License at the Mixed Waste Cell are at or below the Class A low-level radioactive waste limits allowed for disposal elsewhere at the Envirocare facility. One major License change is proposed for this amendment. On March 24, 2003 the Licensee submitted a License amendment request to the Utah Division of Radiation Control that would allow the Licensee to dispose of mixed waste containing: 1) low-level radioactive waste at full Class A activity limits, and 2) NARM (natural occurring or accelerator-produced radioactive material) in the Mixed Waste disposal cell. Class A waste is defined in Utah Radiation Control Rule R313-15-1008 and NARM in R313-12-3. For the purposes of this document, unless specifically delineated, reference to Class A wastes includes NARM.

In order to implement the change requested License Conditions 9.E., 9.G., 15.B., 29.D., and 55 need revision as follows:

License Condition 9.E.

Notwithstanding License Condition 6A1 through 6AAAA3 and 8A1 through 8AAAA3, the Licensee may dispose of Class A Low-Level Radioactive Waste and NARM in both the Class A disposal cell described in License Condition 10.E., and in the Mixed Waste disposal cell. Class A waste is defined in Utah Radiation Control Rule R313-15-1008 and NARM at R313-12-3.

License Condition 9.G.

The Licensee may receive, treat, and dispose radioactively contaminated aqueous liquids and liquid mercury as characterized in the waste profile at the mixed waste facilities only ~~and in accordance with License Conditions 6A1 through 6AAAA3 and 8A1 through 8AAAA3 at receipt~~ the waste must be Class A Low-Level Radioactive Waste at receipt.

License Condition 15.B.

~~At receipt, the concentration of radioactivity in all liquid radioactive wastes or liquid mixed wastes, shall not exceed the limits stated in License Conditions 6 and 8. Reserved~~

License Condition 29.D.

~~Reserved~~ For the Mixed Waste Landfill Cell, the Licensee shall ensure that the maximum acceptable activities used as source terms in the groundwater performance modeling are not exceeded after facility closure. Therefore, the Licensee shall notify the Executive Secretary, at the earliest knowledge, that the following nuclides are scheduled for disposal: Berklum-247 and Cl-36.

License Condition 55.

A. For the Class A disposal cell, the Licensee shall ensure that the actual cumulative activity of chlorine-36 does not exceed 0.2828 picocuries per gram in accordance with the following formula:

$$\frac{\text{Total Activity of chlorine-36 Received (picocuries)}}{\text{Total Mass of Active Cell (grams) + Completed Cell (grams)}} \leq 0.2828 \text{ picocuries per gram}$$

B. For the Class A disposal cell, the Licensee shall ensure that the actual cumulative activity of berklum-247 does not exceed 0.0001 picocuries per gram in accordance with the following formula:

$$\frac{\text{Total Activity of berklum-247 Received (picocuries)}}{\text{Total Mass of Active Cell (grams) + Completed Cell (grams)}} \leq 0.0001 \text{ picocuries per gram}$$

C. For the Mixed Waste disposal cell, the Licensee shall ensure that the actual cumulative activity of chlorine-36 does not exceed 8.75 picocuries per gram in accordance with the following formula:

$$\frac{\text{Total Activity of chlorine-36 Received (picocuries)}}{\text{Total Mass of Active Cell (grams) + Completed Cell (grams)}} \leq 8.75 \text{ picocuries per gram}$$

D. For the Mixed Waste disposal cell, the Licensee shall ensure that the actual cumulative activity of berklum-247 does not exceed 0.00314 picocuries per gram in accordance with the following formula:

$$\frac{\text{Total Activity of berklum-247 Received (picocuries)}}{\text{Total Mass of Active Cell (grams) + Completed Cell (grams)}} \leq 0.00314 \text{ picocuries per gram}$$

Discussion

In considering this request the following four areas were assessed to establish the acceptability of disposing of Class A wastes at the Licensee's mixed waste disposal facility:

- 1) Utah Radiation Control Rules
- 2) Mixed Waste Cell/Cover Design
- 3) Maximum Allowable Concentrations (including mobile isotopes and special nuclear material)
- 4) Radiation Safety

1) Utah Radiation Control Rules

No provision in either Utah Radiation Control Rule R313-15 or R313-25 expressly prohibits the disposal of Class A wastes in approved, licensed, near-surface disposal facilities. The Licensee is currently authorized to dispose of Class A waste in its Clive, UT facility in the Class A Cell. This amendment to the License is necessary to allow the disposal of Class A waste in the Licensee's Mixed Waste Cell; thereby allowing the Mixed Waste Cell to come into full parity with the Class A disposal cell.

The Licensee has been authorized to receive Class A activity concentrations of waste since October 5, 2000 (Amendment 11 of the License) but only now has the Mixed Waste Cell been deemed adequate to accept all Class A levels of waste for disposal.

2) Mixed Waste Cell/Cover Design

In a March 5, 2003 letter, the Executive Secretary of Utah Radiation Control Board confirmed that the Mixed Waste Cell cover design system "meets infiltration and engineering stability performance requirements and is acceptable."

The Executive Secretary further concluded in an October 8, 2003 letter that "the input parameters, methodology, and performance assessment results for the disposal of radionuclides in the Mixed Waste Cell have been critically evaluated, accepted, and approved by the DRC (Utah Division of Radiation Control) and its consultants." In general, Class A equivalent concentrations of radionuclides were included in the evaluation of the Mixed Waste Cell design and performance; and with the exceptions described in Item 3, below, were found to be adequately contained.

3) Maximum Allowable Concentrations

In general and in simplified terms, the acceptability of Class A radioactive waste concentrations in the Mixed Waste Cell was determined by predicting what the radioactivity concentrations in the ground water at a compliance well would be 500 years after closure and comparing those predictions against established ground water protection levels (GWPLs). If the GWPL for a radionuclide was not exceeded for at least a 500-year period, then the Class A waste concentration limit for that radionuclide could be authorized. A total of 261 radionuclides were evaluated. The predictions were derived by applying infiltration and transport modeling performed by Whetstone Associates, Inc. of Lakewood Colorado. The details and the results of the Mixed Waste Cell model are documented in *Envirocare of Utah Mixed Waste Cell Infiltration and Transport Modeling*, Whetstone Associates, November 22, 2000.

For radionuclides with Class A concentration limits specified in R-313-15-1008 the limits were used as inputs to the model. For radionuclides where the limits are expressed in volumetric concentrations (Ci/m^3) a waste density of $1.8 \text{ g}/\text{cm}^3$ was applied to convert the concentrations, for modeling purposes, between curies per cubic meter (Ci/m^3) and picocuries per gram (pCi/g). This value was determined by the Licensee for compacted in place waste and was the same density value used in prior modeling studies.

For radionuclides where no limits are specified for Class A waste the specific activities of the respective radionuclides were conservatively used as input data.

For special nuclear material (SNM) the concentration limits imposed on the Licensee by the Nuclear Regulatory Commission (NRC) *Order To Exempt Envirocare of Utah, Inc. From Certain NRC Licensing Requirements for Special Nuclear Material* (hereafter Order) (see Federal Register 64 FR 27826, May 21, 1999) and adopted by the State of Utah were applied. The NRC SNM limits are at or below respective Class A limits for each radionuclide. In the case of U-233, U-235, Pu-236, Pu-243, and Pu-244 the model input concentrations were less than the Class A concentration limits for these radionuclides.

Based on these concentration inputs, the model identified three radionuclides that exceeded the GWPLs within 500 years at a compliance well located 40 feet from the edge of the cell: Berklum-247, Cf-249, and Chlorine-36. These three radionuclides were evaluated further as described below.

Cf-249 and Cf-251

Subsequent to the issuance of the November 22, 2000 Whetstone Associates modeling report it was discovered that an error was made in the modeling of Cf-251. A half-life of 898 *days* was input in the model when the true half-life of Cf-251 is 898 *years*. In an August 21, 2001 Whetstone Associates report this error was corrected and, based on updated information, adjustments made to the soil-water distribution coefficient (K_d) (0.001 to $2.0 \text{ L}/\text{kg}$) in the Class A Cell model confirming that Class A limits of Cf-251 ($10,000 \text{ pCi}/\text{g}$) would remain in compliance with the longer half-life. Since the infiltration rate is higher at the Class A Cell ($0.364 \text{ cm}/\text{yr}$) compared to that of the Mixed Waste Cell ($0.183 \text{ cm}/\text{yr}$) the conclusion can be conservatively applied to the Mixed Waste Cell. Additionally, the Class A Cell model shows that Cf-251 does not reach the water table in any detectable levels in over 900 years, and the since the vertical transport distance used in the Mixed Waste model (24.3 feet) is longer than the vertical transport distance used in the Class A Cell model (14.54 feet) it is justifiable to predict that vertical transport time at the Mixed Waste Cell for Cf-251 will also be greater than 900 years. Since the vertical transport time alone assures compliance with the 500-year transport criterion, the horizontal transport time need not be scrutinized. Similarly, Cf-249 was modeled using the higher K_d value of $2.0 \text{ L}/\text{kg}$ and found to be in compliance at the Class A concentration of $10,000 \text{ pCi}/\text{g}$. In a September 5, 2001 correspondence the Executive Secretary of the Utah Radiation Control Board concurred with the appropriateness of assigning the K_d value of $2.0 \text{ L}/\text{kg}$ for Californium.

Bk-247 and Cl-36

Through the Mixed Waste Cell model it was determined that the maximum acceptable activity concentrations that satisfy the ground water protection compliance standards for Bk-247 and Cl-36 are 0.00314 pCi/g and 8.75 pCi/g, respectively (November 22, 2000, Whetstone Associates report, p. 15). This implies that at any one time the concentrations of these radionuclides should not be exceeded in the completed and active portions of the Mixed Waste disposal cell.

Restricting the concentrations of these two radionuclides on an ongoing disposal cell basis assures that the ground water will be sufficiently protected during operations and through to the closing of the cell. The Licensee can therefore receive and dispose of wastes containing up to Class A concentrations of Bk-247 and Cl-36 but cannot dispose of quantities of these radionuclides where the cumulative activities of each would cause the concentration in the completed and active portions of the cell to exceed 0.00314 pCi/g for Bk-247 or 8.75 pCi/g for Cl-36.

Although it is questionable whether or not the Bk-247 concentration limit is attainable based on current national inventories of waste bearing this radionuclide, the condition is imposed in the amended license as a safeguard against any unforeseen circumstances. In a like fashion, a maximum concentration of 0.0001 pCi/g Bk-247 is also imposed at the Class A disposal cell for the same reason and to be consistent with requirements at the Mixed Waste Cell. For all these reasons, changes were made to License Conditions 29.D. and 55.

SNM

Regarding SNM, in 2003 the NRC modified the Order (see Federal Register 68 FR 7399, February 13, 2003) but the modification did not affect the permissible radioactivity concentrations. The State of Utah adopted the modified Order and initially incorporated the provisions in Condition 13 of Amendment 16 of the License. The conditions have remained in the License through the current version, Amendment 18. As indicated above, five radionuclides have limiting SNM concentrations that are more restrictive than the concentrations that are allowed for Class A wastes. The SNM Order concentrations were used as inputs to the model and were found to meet the ground water compliance standards. The following table summarizes the applicable concentration limits for SNM.

Radionuclide	Current SNM Limit (pCi/g)	Class A Limit (pCi/g)	Model Inputs (pCi/g) ^c
U-235	1,900	2.16e+06 ^a	1,900
U-233	75,000	9.65e+09 ^a	75,000
Pu-236	500	~4.40e+8 ^b	500
Pu-238	10,000	10,000	10,000
Pu-239	10,000	10,000	10,000
Pu-240	10,000	10,000	10,000
Pu-241	350,000	350,000	350,000
Pu-242	10,000	10,000	10,000
Pu-243	500	~4.40e+8 ^b	500
Pu-244	500	10,000	500

Radionuclide	Current SNM Limit (pCi/g)	Class A Limit (pCi/g)	Model Inputs (pCi/g) ^c
^a Specific Activity of the Radionuclide			
^b Concentration used in the model to approximate Class A limits for radionuclides with less than 5-year half-life			
^c Bold type=model input values that are LESS than Class A limits			

The table above indicates that the Licensee cannot dispose of U-235, U-233, Pu-236, Pu-243, and Pu-244 at the Class A limits because the NRC SNM waste concentrations modeled bound the analyzed condition for the Mixed Waste disposal cell. As such, the SNM limits supercede the general Class A limits, and the Licensee is required to comply with the lower SNM limits.

Note: The NRC has issued another modification to the Order (see Federal Register 68 FR 74986, December 29, 2003), which removes the limiting concentrations for Pu-236, Pu-238, Pu-240, Pu-242, Pu-243, and Pu-244. If, in the future, the State of Utah adopts this modification to the Order the License will be amended appropriately to assure that the limiting concentrations for these plutonium isotopes have been adequately established (i.e. any increases in concentrations have been properly modeled) and the necessary restrictions are imposed.

License Condition 9.G. will continue to require that all wastes characterized as liquids be received, treated, and disposed at the Mixed Waste facilities only; however, with the approval of Class A radioactivity concentration limits at the Mixed Waste facility (License Condition 9.E.), references to License Conditions 6A1 through 6AAAA3 and 8A1 through 8AAAA3 no longer apply and can therefore be deleted from License Condition 9.G. Similarly, with the acceptability of Class A radioactivity concentrations in all wastes at the Mixed Waste facility, the requirement in License Condition 15.B. can be removed since all liquid wastes are required by License Condition 9.G. to be received at the Mixed Waste facility.

4) Radiation Safety

Since there is a potential for higher exposure rates associated with higher concentrations of radioactivity at the Mixed Waste facility, the impact of this change to the health and safety of the employees warrants examination.

In a letter dated October 20, 2003, the Licensee responded to the Utah Division of Radiation Control's concern for worker protection during treatment and disposal operations at the Mixed Waste Facility. The Licensee describes in broad terms the processes that take place to ensure exposures to workers are kept as low as reasonably achievable (ALARA) and refers to doses delivered to workers in the past (approximately 0.4% of the state and federal limit of 5.0 rem/yr) as evidence of the effectiveness of its overall radiation protection program. Provided the Licensee continues to administer its radiation protection program adequately the disposal of Class A wastes at the Mixed Waste facility should not cause the employees to be at risk of exposures exceeding regulatory limits. The Licensee has been receiving Class A levels of waste at the Bulk Waste facility and at the Containerized Waste facility and has demonstrated the ability to meet established ALARA goals at these operations.

Minor License Changes

Item 1: On October 22, 2003, the Licensee submitted a letter (CD03-0430) requesting that the requirement to report when Cf-249 and Cf-250 are scheduled for disposal at the Class A Cell be removed. The proposed change is as follows:

License Condition 29.E. (Revision)

For the Class A disposal cell, the License shall ensure that the maximum acceptable activities used as source terms in the groundwater performance modeling are not exceeded after facility closure. Therefore, the Licensee shall notify the Executive Secretary, at the earliest knowledge, that the following nuclides are scheduled for disposal: aluminum-26, berklium-247, calcium-41, ~~californium-249~~, californium-250, chlorine-36, rhenium-187, terbium-157, and terbium-158.

Discussion

Because Cf-249 has been re-modeled (Whetstone Associates, Technical Memorandum, 4101M, *Results of CF-251 Modeling for the Class A Cell, Using the 898-Year Half Life*, August 21, 2001, p. 2) at the Class A limit at the Class A Cell and found to be in compliance with the groundwater protection restrictions the notice to the Executive Secretary for this californium isotope is no longer necessary. On the other hand, the transport modeling performed for Cf-250 at the Class A Cell did not consider concentrations at the Class A level and therefore as an unanalyzed condition the reporting of Cf-250 at the Class A Cell must continue.

Item 2: In a June 5, 2003 letter (CD03-0257), the Licensee requested to amend License Conditions 40, 41, and 42 regarding disposal of mobile wastes at the LARW disposal cell. Following are the proposed revisions to these conditions:

License Condition 40. (Revision)

~~In the~~The LARW disposal cell, ~~disposal of mobile waste~~ shall be ~~restricted to the top slope area of the LARW cell, as limited defined by the area enclosed~~ by the points of reference in Table 40-A. ~~In the LARW Cell, waste lifts containing any mobile waste shall be designated as mobile waste lifts and shall be disposed of within the mobile waste boundaries.~~

TABLE 40-A

<u>LARW Cell Waste Disposal</u> Boundaries of Mobile Waste <u>Disposal and LARW Cell</u> <u>Topslope Design</u>	Points of Reference	
	Latitude	Longitude
<u>LARW Cell Waste Disposal Boundaries</u>		
Northeast Corner	40°41' 10.700524" N	113° 6' 36.372920" W
Southeast Corner	40°40' 52.230624" N	113° 6' 36.713462" W
Southwest Corner	40°40' 52.379041" N	113° 6' 51.184491" W
Northwest Corner	40°41' 10.851418" N	113° 6' 50.846182" W
<u>Mobile Waste Disposal Boundaries</u>		
Northeast Corner	40°41' 10.206265" N	113° 6' 37.022208" W

Southeast Corner	40°40' 52.823735" N	113° 6' 37.391607" W
Southwest Corner	40°40' 52.972152" N	113° 6' 50.405346" W
Northwest Corner	40°41' 10.357159" N	113° 6' 50.196894" W
LARW Topslope Cover Design Boundaries (Envirocare Drawing 9407-4, Rev.1, 2/18/98)		
Northeast Corner	40°41' 7.381332" N	113° 6' 38.365806" W
Southeast Corner	40°40' 55.771282" N	113° 6' 38.838893" W
Southwest Corner	40°40' 55.722242" N	113° 6' 53.177077" W
Northwest Corner	40°41' 7.285150" N	113° 6' 52.874199" W

License Condition 41. (Revision)

The LARW Cell ~~topslope~~ shall be constructed in accordance with all engineering design and specifications approved by this license, and as restricted to the points of reference, as provided in Table 40-A.

License Condition 42. (No Change)

"Mobile wastes" are defined as any waste containing any quantity of the following isotopes: carbon-14, iodine-129, neptunium-237, sodium-22, technetium-99, hydrogen-3 (tritium), americium-242m, bismuth-210m, curium-245, curium-246, curium-248, gadolinium-148, iron-60, mercury-194, holmium-166m, selenium-79, silicon-32, tin-121m, tin-126, thorium-229, titanium-44, and zirconium-93.

Discussion

The Licensee redesigned the LARW Cell cover to allow disposal of mobile radionuclides anywhere within the LARW Cell Waste Disposal Boundaries; whereas before, such wastes were restricted to disposal under the topslope cover. On October 9, 2003 the Executive Secretary of the Utah Radiation Control Board issued a letter to the Licensee indicating that because a pending modification to the Groundwater Discharge Permit UGW450005 (Permit) imposes additional cover system enhancements, restricting mobile waste to the topslope area of the LARW cell is no longer necessary. The Permit modification was signed on October 14, 2003. The revised cover design adds a sacrificial soil layer to the sideslopes, creating a frost barrier, thus improving the cover performance to allow the disposal of mobile isotopes under both the topslopes and sideslopes of the LARW embankment.

As a result of these actions it is proposed that License Condition 40 be revised to remove the confinement of mobile wastes to the topslope area. References to Mobile Waste Disposal Boundaries and LARW Topslope Cover Design Boundaries will no longer be needed and will be removed from Table 40-A. This change only impacts the area of the LARW Cell that is yet uncovered. Currently, the majority of the cell has been completed with a cover in place. Recently the Licensee committed to fill the remaining cell space and complete the cover of the entire cell by November 01, 2004 see July 3, 2003 Settlement Agreement (UGW03-01A). Later, a 32-day extension to the completion schedule was issued by the Executive Secretary of the Radiation Control Board on April 16, 2004, which extended the LARW cell completion deadline to December 03, 2004.

In the request the Licensee asked that License Conditions 41 and 42 be deleted entirely, but until the LARW Cell is completed and closed these conditions shall remain in the License. Condition

41 was revised, however, to expand the reference to construction requirements from just the top slope to the entire LARW Cell. "Mobile wastes" are defined in Condition 42 which is information not found elsewhere. There is no consequence in keeping this information available and will therefore be retained in the License. At the time the LARW Cell is closed these License Conditions can be reevaluated to determine if they need to be retained or eliminated.

Item 3: In a letter dated April 23, 2004 the Utah Division of Radiation Control (DRC) approved a request to change the requirements of License Condition 11. An amendment to the License is required to incorporate this change.

License Condition 11. Revision

The open cell area within the LARW and Class A disposal embankments where waste disposal/placement has or may occur, but the cover system has not been completed shall be limited to ~~2,450,000~~2,938,288 square feet. Uncovered radioactive waste shall be limited to a surface area of 1,020,000 square feet.

Discussion

The original Envirocare request was for an expansion from 2,450,000 to 3,000,000 square feet of open disposal cell area. In support of this change Envirocare submitted an increase in the surety (see Wells Fargo Bank letter of credit (LOC) Amendment No. 11 dated March 2, 2004). Later, a second LOC Amendment No.12, dated April 2, 2004 was also submitted. Combined these two LOC amendments represented a \$1,479,513 increase in the surety. In an April 23, 2004 letter the Executive Secretary of the Utah Board of Radiation Control found this increase to be adequate for several proposed actions, including an increase in the open cell area from 2,450,000 to 2,938,288 square feet. For details regarding this surety approval see the April 23, 2004 letter.

Item 4: Typographical corrections were made to the following:

License Condition 9.H.

The Licensee may receive and utilize as a training device one radioactively contaminated USDOT Specification 7A Type A shipping cask at the Containerized Waste Facility.
The cask is to be maintained as referenced in ~~Licensee~~License Condition 84.T.(2).

License Condition 18.

The Licensee shall comply with the provisions of UAC R313-18, "Notices, Instructions and Reports to Workers by Licensees or Registrants,~~---~~Inspections" and UAC R313-15, "Standards for Protection Against Radiation."

License Condition 63

Radioactive and mixed wastes within Section 32 and all rail spurs controlled by the licensee around the Licensee's Disposal Facility ~~is-are~~ possessed by the Licensee...

Item 5: Relevant documents regarding Amendment 19 are required to be listed in License Condition 84 and will appear as paragraph V. as follows:

License Condition 84

Except as specifically provided otherwise in this license, the Licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The Utah Radiation Control Rules, Utah Administrative Code R313 shall govern unless the statements, representations, and procedures in the Licensee's application and correspondence are more restrictive than the rules.

A. License renewal application, revision 6, dated 16 March 1998.

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V. The following documents refer to revisions made in Amendment 19:

- (1) Envirocare of Utah Mixed Waste Cell Infiltration and Transport Modeling, Whetstone Associates, November 22, 2000
- (2) Letter CD01-0377, dated August 23, 2001, addendum to Class A Cell modeling (Whetstone Associates, Inc August 21, 2001 Technical Memorandum)
- (3) Letter DRC, dated March 5, 2003, acceptance of Mixed Waste disposal cell cover system design
- (4) Letter CD03-0123, dated March 24, 2003, initial request to allow full Class A LLRW at the Mixed Waste Facility
- (5) Letter CD03-0428, dated October 20, 2003, response to DRC request for additional information regarding Class A waste at the Mixed Waste Cell
- (6) Letter CD03-0430, dated October 22, 2003, justification for allowable concentrations of Californium isotopes at the Mixed Waste Cell
- (7) Letter CD03-0257, dated June 5, 2003, initial request to allow placement of mobile wastes in the sideslopes of the LARW Cell
- (8) Letter CD03-0295, dated July 7, 2003, response to DRC concern regarding the transition zones between the non-mobile and mobile cover designs
- (9) Letter DRC, dated October 9, 2003, authorization for Licensee to dispose of mobile wastes in accordance with the Groundwater Discharge Permit modification prior to amending the License
- (10) Letter DRC, dated April 23, 2004, approval of open cell area expansion request

REFERENCES

1. *Envirocare of Utah Mixed Waste Cell Infiltration and Transport Modeling*, Whetstone Associates, November 22, 2000
2. Letter CD01-0377, dated August 23, 2001, addendum to Class A Cell modeling (Whetstone Associates, Inc August 21, 2001 Technical Memorandum)
3. Letter DRC, dated March 5, 2003, acceptance of Mixed Waste disposal cell cover system design
4. Letter CD03-0123, dated March 24, 2003, initial request to allow full Class A LLRW at the Mixed Waste Facility
5. Letter CD03-0428, dated October 20, 2003, response to DRC request for additional information regarding Class A waste at the Mixed Waste Cell
6. Letter CD03-0430, dated October 22, 2003, justification for allowable concentrations of Californium isotopes at the Mixed Waste Cell
7. Letter CD03-0257, dated June 5, 2003, initial request to allow placement of mobile wastes in the sideslopes of the LARW Cell
8. Letter CD03-0295, dated July 7, 2003, response to DRC concern regarding the transition zones between the non-mobile and mobile cover designs
9. Letter DWQ, dated August 12, 2003, LARW Open Cell Settlement Agreement UGW03-01A: Compliance Schedule
10. Letter DRC, dated October 9, 2003, authorization for Licensee to dispose of mobile wastes in accordance with the Groundwater Discharge Permit modification prior to amending the License
11. Letter DRC, dated April 16, 2004, compliance schedule extension, Settlement Agreement UGW03-01A
12. Letter DRC, dated April 23, 2004, approval of open cell area expansion request